

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460  
OFFICE OF SOLID WASTE

OFFICE OF WATER  
AND WASTE MANAGEMENT

JUNE 24, 1981

Mr. W.R. Riedel  
United States Coast Guard (G-WS-1)  
Washington, D.C. 20593

Dear Mr. Riedel:

This letter is to confirm your understanding of my recent discussions with Mr. William McGovern and Lt. Cmdr. Marcolini concerning the SAFT Gelled Electrolyte Primary Batteries.

Based on my evaluation of the information they provided, these batteries, when discarded, would not be hazardous waste within the meaning of Subtitle C of the Resource Conservation and Recovery Act of 1976. The batteries do not exhibit any of the characteristics of a hazardous waste (40 CFR 261.21-.24) and are not listed as a hazardous waste (40 CFR 261.31-.33).

Thus, they are not subject to the hazardous waste management requirements 40 CFR 262-267. Coast Guard facilities generating this type of battery waste would not have to notify the EPA and they do not have to be disposed of in a permitted hazardous waste facility.

If you or any of the various states which administer a hazardous waste management program would like further information on the basis for my conclusion, please feel free to give me a call at 202-755-9187.

Sincerely,

David Friedman  
Manager  
Waste Analysis Program  
Hazardous and Industrial Waste Division (WH-565)

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DEPARTMENT OF TRANSPORTATION  
UNITED STATES COAST GUARD

MAILING ADDRESS  
U.S. COAST GUARD (G-WS-1)  
WASHINGTON, D.C. 20593  
PHONE (202) 426-3300

Mr. David Friedman  
Waste Characteristics Branch  
Office of Solid Waste  
Environmental Protection Agency  
401 M Street S.W.  
Washington, D.C. 20460

Dear Mr. Friedman:

This letter is to verify your recent discussion with Mr. William McGovern, of my staff, concerning whether or not the SAFT Gelled Electrolyte Primary Batteries used by the Coast Guard constitute a hazardous waste at the time of disposal.

On 11 June 1981 you advised Mr. McGovern that because of the Gelled Electrolyte and sealed nature of these batteries they would not be considered hazardous waste. The Coast Guard intends to explain to various states, which administer hazardous waste programs, that the Environmental Protection Agency does not consider this type battery to be a hazardous waste, and thus it is not subject to the requirements of 40 CFR 260-265. Additionally, based on the above determination the Coast Guard plans to inform all field units that they are not required to file notification to EPA on SAFT gelled electrolyte batteries under 140 CFR 261.

I very much appreciate the time EPA has given to helping resolve our battery disposal problems. If any of the above is not in line with your understanding please notify me. Any questions on this matter should be addressed to Mr. McGovern, at (202) 426-3300.

Sincerely,

W.R. RIEDEL  
Chief, Ports and Waterways  
Planning Staff  
By direction of the Commandant

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